

REMARKS

In the Final Office Action dated April 26, 2006, the Examiner rejected claims 1, 2, 5, 8, 9, 12, 15-18, 21, 24, 25, 28, 31, and 32 under 35 U.S.C. § 103(a) as being unpatentable over *Hazard* (U.S. Patent No. 6,658,566) in view of *Sudia* (Published U.S. Patent Application 2005/0114666);¹ rejected claims 3, 4, 6, 10, 11, 13, 19, 20, 22, 26, 27, and 29 under 35 U.S.C. § 103(a) as being unpatentable over *Hazard* in view of *Sudia* and further in view of *Dilkie et al.* (U.S. Patent No. 6,341,164); and rejected claims 7, 14, 23, and 30 under 35 U.S.C. § 103(a) as being unpatentable over *Hazard* in view of *Sudia* in further view of "Applied Cryptography" by Schneier ("*Schneier*").

Applicants respectfully traverse the rejection of claims 1, 2, 5, 8, 9, 12, 15-18, 21, 24, 25, 28, 31, and 32 under 35 U.S.C. § 103(a) because *Hazard* in view of *Sudia* fail to establish a *prima facie* case of obviousness. *Hazard* and *Sudia*, taken alone or in combination, do not teach or suggest all the claim elements. See M.P.E.P. § 2143.03.

Claim 1 recites an information recording device comprising a cryptosystem unit and an integrity checking unit.

Hazard and *Sudia* fail to disclose a "cryptosystem unit that selectively uses a different encryption key for each sector from the first sector to the M-th sector," as recited in independent claims 1 and 8, and similarly recited in independent claims 15, 17, 24, 31, and 32. The Examiner contends that the above recitation is taught by *Hazard*, and cites to col. 4, lines 28-46 and col. 5, lines 1-22. (*Final Office Action*, p. 2.) Applicants respectfully disagree.

¹ The Examiner failed to include claims 9 and 12 in the heading of the rejection. However, based on the body of the rejection, it appears that claims 9 and 12 were intended to be included.

Hazard is directed towards a method of storing a plurality of sensitive information IS_j in a security module 8 by first encrypting the plurality of sensitive information IS_j with a plurality of encryption protection keys CP_j. (*Hazard*, 2:3-13.) *Hazard* defines “sensitive information” as “any information deemed confidential by the person holding it, for example a bank account number, a message, or even an entire document.” (*Id.* at 1:36-38.) The sensitive information IS_j, “each of which is stored in the security module in encrypted form [is encrypted] using an encryption algorithm and a temporary protection key.” (*Id.* at 5:17-19.) In *Hazard*, the entire sensitive information IS_j is encrypted using one encryption key. *Hazard* thus fails to disclose a “different encryption key for each sector,” as recited in claim 1. The item disclosed by *Hazard* does not suggest the claimed sector.

In addition, *Hazard* and *Sudia*, taken alone or in combination, also fail to teach a “revocation list having revocation information regarding revoked media or content,” as recited in independent claims 1, 8, 15, 17, 24, 31, and 32. The Examiner admits that *Hazard* fails to disclose this recitation, and relies on *Sudia* to cure this deficiency. However, contrary to the Examiner’s assertion, the revocation information of *Sudia* does not disclose the claimed revocation list. Instead, *Sudia* discloses the use of digital certificates to control access to data involved in electronic commerce on the Internet. (*Sudia* at ¶ 3.) The digital certificates include revocation status information, so that a relying party will know whether a certain privilege has been revoked from the user of the digital certificate. (*Id.* at ¶ 244.) Therefore, the revocation list pertains to privileges of a user, and does not include “revocation information regarding revoked media or content,” as claimed.

Hazard and *Sudia*, taken alone or in combination, further fail to teach a “block permission table for accessing a permission table that describes memory access control information,” as recited in independent claims 1, 8, 15, 17, 24, 31, and 32. Contrary to the Examiner’s assertion, the revocation information of *Sudia* also does not disclose the claimed block permission table. The revocation information has nothing to do with “**memory access** control information.” Instead, the revocation information involves the privileges of a user of a digital certificate, such as the privilege to conduct a transaction up to \$1,000. (Id. at ¶¶ 231 and 244.)

Since *Hazard* and *Sudia* do not disclose a revocation list or a block permission table, as claimed, they likewise do not disclose an “integrity checking unit for checking the integrity of the revocation list and the block permission table,” as recited in independent claims 1, 8, and 15, and similarly recited in independent claims 17, 24, 31, and 32. Indeed, *Sudia* does not appear to disclose checking the integrity of the revocation information. Although the Examiner asserts that an integrity check is made, the Examiner has failed to cite to any specific passage within *Sudia* for this disclosure. If the Examiner maintains the rejection, Applicants respectfully request that the Examiner clearly articulate how *Sudia* discloses this recitation, such that Applicants may be given a fair opportunity to reply.

Thus, even if *Hazard* were combined with *Sudia* as the Examiner suggests, *Hazard* and *Sudia* do not disclose all the elements recited in independent claims 1, 8, 15, 17, 24, 31, and 32. For at least this reason, the cited prior art fails to establish a *prima facie* case of obviousness regarding independent claims 1, 8, 15, 17, 24, 31, and 32. Accordingly, Applicants respectfully request withdrawal of the rejection of

independent claims 1, 8, 15, 17, 24, 31, and 32 under 35 U.S.C. § 103(a) and the timely allowance of the claims. Dependent claims 2, 5, 16, 21, 25, and 28 are also allowable at least by virtue of their respective dependence from allowable independent claims 1, 8, 15, 17, and 24.

Applicants respectfully traverse the rejection of claims 3, 4, 6, 10, 11, 13, 19, 20, 22, 26, 27, and 29 under 35. U.S.C. § 103(a) as being unpatentable over *Hazard* in view of *Sudia*, further in view of *Dilkie et al.* Applicants disagree with the Examiner's arguments and conclusions. A *prima facie* case of obviousness has not been established.

As demonstrated above, *Hazard* in view of *Sudia* fail to teach or suggest all the elements of independent claims 1, 8, 15, 17, 24, 31, and 32. Further, the Examiner does not rely upon, nor does *Dilkie et al.* disclose the deficiencies of *Hazard* and *Sudia* discussed above. Therefore, the Examiner's application of *Dilkie et al.* as an additional reference does not render obvious the recitations of Applicants' dependent claims 3, 4, 6, 10, 11, 13, 19, 20, 22, 26, 27, and 29. Accordingly, dependent claims 3, 4, 6, 10, 11, 13, 19, 20, 22, 26, 27, and 29 are allowable at least by virtue of their respective dependence from allowable independent claims 1, 8, 15, 17, 24, 31, and 32.

Applicants respectfully traverse the rejection of claims 7, 14, 23, and 30 under 35. U.S.C. § 103(a) as being unpatentable over *Hazard* in view of *Sudia* further in view of *Schneier*. Applicants disagree with the Examiner's arguments and conclusions. A *prima facie* case of obviousness has not been established.

As demonstrated above, *Hazard* in view of *Sudia* fail to teach or suggest all the elements of independent claims 1, 8, 15, 17, 24, 31, and 32. Further, the Examiner

does not rely upon, nor does *Schneier* disclose the deficiencies of *Hazard* and *Sudia* discussed above. Therefore, the Examiner's application of *Schneier* as an additional reference does not render obvious the recitations of Applicants' dependent claims 7, 14, 23, and 30. Accordingly, dependent claims 7, 14, 23, and 30 are allowable at least by virtue of their respective dependence from allowable independent claims 1, 8, 15, 17, 24, 31, and 32.

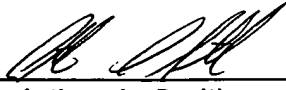
In view of the foregoing remarks, Applicants respectfully request the reconsideration of this application and the timely allowance of the pending claims. The preceding arguments are based on the arguments presented in the Office Action, and therefore do not address patentable aspects of the invention that were not addressed by the Examiner in the Office Action. The pending claims may include other elements that are not shown, taught, or suggested by the cited art. Accordingly, the preceding argument in favor of patentability is advanced without prejudice to other bases of patentability. Furthermore, the Office Action contains a number of statements reflecting characterizations of the related art and the claims. Regardless of whether any such statement is identified herein, Applicants decline to automatically subscribe to any statement or characterization in the Office Action.

Please grant any extensions of time required to enter this response and charge any additional required fees to our deposit account 06-0916.

Respectfully submitted,

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